

January 5, 2022

**By ECF**

Hon. Eric R. Komitee  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201  
Courtroom: 6G North

**Re: *Edmondson, et al. v. Raniere, et al.*, 1:20-CV-00485-EK-CLP**

Dear Judge Komitee:

Pursuant to Fed. R. Civ. P. 6(b), E.D.N.Y. L. Civ. R. 7.1(d) and this Court's Individual Practices and Rules Section I.C, Defendant Clare Bronfman ("Ms. C. Bronfman") submits this letter motion seeking a two-week extension in time to submit her motion to dismiss and brief in support. In support of her motion she states as follows:

On November 30, 2021, this Court entered a minute order setting the following briefing schedule for Defendants' anticipated motions to dismiss: motions by January 14, 2022; response by February 14, 2022; and replies, if any, by February 28, 2022. Dkt. 120.

Due to the recent rise in COVID cases and corresponding travel restrictions, attorneys for Ms. C. Bronfman have been unable to communicate with Ms. C. Bronfman. Also, over the holidays one of the key attorneys for Ms. C. Bronfman contracted COVID. Accordingly, Ms. C. Bronfman requests to extend all motion to dismiss briefing deadlines by two weeks and proposes the following amended briefing schedule:

- Defendants to submit motions by January 28, 2022;
- Plaintiffs to submit responses by February 28, 2022;
- Defendants to submit replies, if any, by March 14, 2022.

This is Ms. C. Bronfman's first request for an extension of time and is submitted at least two business days prior to the scheduled deadline. Counsel appearing for Plaintiffs and Defendant Ms. S. Bronfman have consented to the above proposed schedule.

Respectfully,

**WILLKIE FARR & GALLAGHER LLP**

/s/ Craig C. Martin  
Craig C. Martin

Cc: All Counsel by ECF